



DM Petroleum Operations Company
Strategic Petroleum Reserve



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Ms. Jeanie Franke
Planning and Analysis Branch
Permits Processing Team (6WQ-NP)
U.S. EPA, Region 6
1445 Ross Avenue
Dallas, Texas 75202-2733

December 17, 2013
31016-TMW-13-104

Dear Ms. Franke:

Subject: NPDES APPLICATION No. TX0092827, Big Hill SPR Oil Storage Facility
Reference: Letter: Franke (EPA) to Westbrook (DM); dated November 22, 2013, same subject.

DM Petroleum Operations Company (DM), the management and operating contractor for the U.S. Strategic Petroleum Reserve (SPR), has prepared and submits this response to the referenced letter on behalf of the U.S. Department of Energy (owner, operator, and permittee).

The referenced correspondence contains three questions regarding the subject application calling for additional information to be supplied within 30 days. Two of the questions request information pertaining to the water discharges from outfalls authorized in the current permit, and the third question asks for information pertaining to the site and surrounding areas potentially affected by those authorized discharges.

Please accept the enclosed Response Sheet providing detailed information for each question in the same numerical sequence posed by EPA in the reference letter. The response sheet shall restate each question and then follow with a response including a brief statement of the data source used.

If Region VI, U.S. Environmental Protection Agency, should require any further information, please contact Mr. Thomas Westbrook of DM Petroleum Operations Company at (504)734-4142.

In addition, I respectfully request that any correspondence directed to DM Petroleum Operations Company concerning this letter include a courtesy copy directed to the attention of: Mr. W.C. Gibson, Jr., Project Manager, Strategic Petroleum Reserve, U.S. Department of Energy, Project Management Office, 900 Commerce Road East, New Orleans, LA 70123. Thank you.

Sincerely,

James E. Leemann, Ph.D.
Director,
Environmental Department

Enclosures:
As stated

cc: W. Woods, DOE, FE-4441
S. Leingang, DOE, FE-4451 (w/o enclosures)

**RESPONSE SHEET
NPDES APPLICATION TX0092827
BIG HILL SPR OIL STORAGE FACILITY**

Question 1: Please submit 2 years of flow data from each outfall (maximum and average from each outfall).

Response 1:

Permit TX0092827 authorizes discharges from 9 total outfalls. Four of the outfalls are discharges with flow reporting requirements and five discharges are of stormwater with no permit-stated flow reporting. The outfalls with flow reporting, DMRs are used to provide the response for the full and complete calendar years 2011 and 2012. Outfalls with no flow reporting (stormwater), estimates are made using rainfall data applied to drainage (containment) area. Available sources for the rainfall data used are the Water Flow Schematic for the site using 60inches rainfall/year; NOAA; and EISA Section 438 Guidance. Outfall 009 is reported in barrels/day and the MGD equivalent.

Outfall 001: Brine to Gulf – MAX is 13.73MGD; AVG is 3.86MGD

Outfall 002: Hydroclone – NA; no flows during period

Outfall 003: Stormwater, Internal Combined outfall from 14 cavern pads – MAX is 0.086MGD; AVG is 0.060MGD

Outfall 004: Treated sanitary sewage wastewater – MAX is 0.0036MGD; AVG is 0.0011MGD

Outfall 005: Stormwater Power Substation – MAX is 0.0132MGD; AVG is 0.0092MGD

Outfall 006: Stormwater Surge Tank – MAX is 0.0072MGD; AVG is 0.0050MGD

Outfall 007: Stormwater MeterSkid/FoamRetention – MAX is 0.0005MGD; AVG is 0.0004MGD

Outfall 008: Stormwater RWIS Curbs – MAX is 0.0007MGD; AVG is 0.0005MGD

Outfall 009: Recirculation Loop RWIS – MAX is [0.559bbls/D], 23.48MGD; AVG is [0.022bbls/D], 0.92MGD

Question 2: Clarify that there were no discharges from outfall 002 and 009. Permits for Industrial discharges are based on the most recent 2 years of effluent data.

Response 2:

Outfall 002 is an inactive unit representing a backwash flow from raw water filtration (hydroclone). The “no discharge” DMRs filed for each monitoring period during CY2011 and CY2012 were used for the response.

Outfall 009 is an outfall of unaffected, non-contact, recirculated ambient surface water. The unit had minimal flows in CY2012 due to repairs being affected and operated normally in CY2011. All flows reported on the DMRs filed for CY2011 and CY2012 were used for this narrative response and also those data supplied in Response No. 1.

Question 3: Verify if there is any historical archeological preservation in the area.

Response 3:

On August 15, 2012, the State Historic Preservation Officer, Texas Historical Commission, responded to an SPRPMO inquiry certifying with a signed seal that “No Historic Properties Affected, Projects May Proceed” for both the Big Hill and Bryan Mound SPR sites.